

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS
12TH DIVISION

STATE OF ARKANSAS, *ex rel.*
TIM GRIFFIN, ATTORNEY GENERAL

PLAINTIFF

v.

CASE NO. 60CV-19-6678

NEILL REED and JERIC GOODRUM

DEFENDANTS

CONSENT JUDGMENT

NOW ON THIS DAY comes before the Court for consideration the entry of a Consent Judgment between the State of Arkansas, *ex rel.* Tim Griffin, Attorney General (the “State”), and Defendants Neill Reed and Jeric Goodrum (collectively “Defendants”). The Plaintiff appears by and through its counsel, Jason Epperson, and Defendants appear by and through counsel, Harrison Kemp and Joie Cherry.

The State initiated this action to redress and restrain alleged violations of the Arkansas Deceptive Trade Practices Act (“ADTPA”), Ark. Code Ann. §§ 4-88-101, *et seq.* The State and Defendants wish to resolve this action. The parties recognize that this Consent Judgment has been negotiated by the parties in good faith, and that this Consent Judgment is fair, reasonable, and in the public interest.

Based upon the facts and matters before this Court, and with the consent of the parties to this Judgment, it is hereby ORDERED, ADJUDGED, and DECREED:

I. Definitions

1. Unless otherwise indicated, the terms used herein shall carry those definitions provided by the ADTPA.

II. Jurisdiction

2. This Court has jurisdiction over this matter pursuant to Ark. Code Ann. § 4-88-104, and the common law of the State of Arkansas. Venue is proper pursuant to Ark. Code Ann. § 4-88-104, § 4-88-112, and the common law of the State of Arkansas. The Defendants have transacted business in the State of Arkansas.

3. For purposes of this Consent Judgment, the State and Defendants waive all objections and defenses that they may have to the jurisdiction or venue of the Circuit Court of Pulaski County, Arkansas, and shall not challenge the Court's jurisdiction over any enforcement action in the event of breach.

III. Parties Bound

4. This Consent Judgment applies to and is binding upon the State and Defendants.

5. Any change in ownership or status of a party, including, but not limited to, any transfer of assets or real or personal property, shall in no way alter Defendants' responsibilities under this Consent Judgment.

IV. The Attorney General's Position

6. Defendants violated the ADTPA by abusing Arkansas's tax-delinquent property sales procedures to file fraudulent deeds.

7. Defendants would first locate tax-delinquent properties that were soon to be auctioned off by the Commissioner of State Lands.

8. Defendants would then forge a quitclaim deed to themselves or their businesses on behalf of property owners without the owners' knowledge.

9. After recording the quitclaimed deeds to themselves, Defendants would sell their property interests to third parties for a profit.

10. Additionally, the Attorney General has received multiple complaints against Defendants regarding property transfers involving deceased notaries, deceased record title owners, and properties with wrongfully clouded titles.

11. The conduct engaged in by Defendants constitutes deceptive and unconscionable trade practices prohibited by the ADTPA, including violations of Ark. Code Ann. § 4-88-107(a)(10).

12. The Attorney General specifically denies the assertions of Defendants set forth in "Defendants' Position" in this Consent Judgment.

V. Defendants' Position

13. Defendants deny the legal and factual assertions contained in Section IV above, entitled "The Attorney General's Position."

VI. Injunctive Relief

14. Defendants are permanently enjoined from conducting any business involving the redemption and sale of tax-delinquent property, either individually, jointly, severally, or as a member/partner of any affiliated or unaffiliated business entity.

15. Defendants are permanently restrained and enjoined from violating the ADTPA.

VII. Monetary Provisions for Neill Reed

16. **Consumer Education and Enforcement Fund.** Defendant Neill Reed shall pay \$25,000 to the State as a contribution to the Consumer Education and Enforcement Fund. The balance shall be paid by November 1, 2027. Each \$5,000.00 annual payment shall be submitted to the State on or before November 1, with the first payment due on November 1, 2023. All checks will be delivered to the Chief Financial Officer, Office of the Attorney General, 323 Center Street, Suite 200, Little Rock, AR 72201. The amount shall be used in accordance with Act 763 of 2013 of the Arkansas General Assembly. All payments and obligations under this section apply solely to Neill Reed and are separate from any payments or obligations of Separate Defendant Jeric Goodrum.

17. **Suspended Civil Penalty.** Defendant Neil Reed is assessed civil penalties under Ark. Code Ann. § 4-88-113(a)(3) in the amount of \$80,000.00. Violations of the ADTPA are punishable by up to a \$10,000 fine per violation. This Civil Penalty is **SUSPENDED**. Should Neill Reed violate any portion of this Consent Judgment, the suspended penalty shall become immediately due and payable. The payment shall be delivered to Chief Fiscal Officer, Arkansas Attorney General's Office, 323 Center Street, Suite 200, Little Rock, Arkansas 72201, and shall bear the name of Defendant Neill Reed upon the face of the check. A copy of the payment shall be contemporaneously delivered to the Attorney General's counsel of record in this matter. The payment of this sum shall be in addition to any restitution, civil penalty, attorney fees or costs, or other sanctions ordered by the court due to the violation(s) triggering this provision. All civil penalties assessed against Neill Reed and related

obligations under this section are separate from those required of Separate Defendant Jeric Goodrum.

VIII. Monetary Provisions for Jeric Goodrum

18. **Consumer Education and Enforcement Fund.** Defendant Jeric Goodrum shall pay \$25,000 to the State as a contribution to the Consumer Education and Enforcement Fund. The balance shall be paid by November 1, 2027. Each \$5,000.00 annual payment shall be submitted to the State on or before November 1, with the first payment due on November 1, 2023. All checks will be delivered to the Chief Financial Officer, Office of the Attorney General, 323 Center Street, Suite 200, Little Rock, AR 72201. The amount shall be used in accordance with Act 763 of 2013 of the Arkansas General Assembly. All payments and obligations under this section apply solely to Jeric Goodrum and are separate from any payments or obligations of Separate Defendant Neill Reed.

19. **Suspended Civil Penalty.** Defendant Jeric Goodrum is assessed civil penalties under Ark. Code Ann. § 4-88-113(a)(3) in the amount of \$80,000.00. Violations of the ADTPA are punishable by up to a \$10,000 fine per violation. This Civil Penalty is **SUSPENDED**. Should Jeric Goodrum violate any portion of this Consent Judgment, the suspended penalty shall become immediately due and payable. The payment shall be delivered to Chief Fiscal Officer, Arkansas Attorney General's Office, 323 Center Street, Suite 200, Little Rock, Arkansas 72201, and shall bear the name of Defendant Neill Reed upon the face of the check. A copy of the payment shall be contemporaneously delivered to the Attorney General's counsel of record in this matter. The payment of this sum shall be in addition to any restitution,

civil penalty, attorney fees or costs, or other sanctions ordered by the court due to the violation(s) triggering this provision. All civil penalties assessed against Jeric Goodrum and related obligations under this section are separate from those required of Separate Defendant Neill Reed.

IX. Miscellaneous Provisions

- a. This Consent Judgment constitutes the entire agreement of the Attorney General and Defendants. The undersigned acknowledge that there are no communications or oral understandings contrary, different, or which in any way restrict this Consent Judgment, and that any and all prior agreements or understandings within the subject matter of this Consent Judgment are, upon the effective date of the Consent Judgment, superseded, null and void.
- b. This Consent Judgment resolves and releases all civil claims, causes of action, or proceedings that were or could have been asserted by the Attorney General against Defendants for those practices alleged within its Complaint. This release shall not in any way limit the authority of the Attorney General to conduct such investigations as she deems advisable or to bring any enforcement action regarding alleged violations of law unrelated to its Complaint or occurring after the date of this Consent Judgment. Also, the Attorney General is empowered to seek enforcement of any and all sections of this Consent Judgment by appropriate petition to this Court.

- c. Nothing in this Consent Judgment shall be construed to deprive any person or entity not a signatory hereto of any private right of action of any kind whatsoever, nor shall this Consent Judgment be construed to create any private right of action for any person or entity not a signatory hereto.
- d. This Consent Judgment does not constitute an admission by Defendants of any fact or the existence or application of any law, regulation, or legal principle.
- e. This Consent Judgment represents solely a compromise of disputed claims within the meaning of Rule 408 of the Federal and Arkansas Rules of Evidence. The document is not admissible to prove liability for, invalidity of, or amount of the claim or any other claim. This Consent Judgment and all actions of the parties pursuant to this Consent Judgment are intended by the parties to be exclusively a compromise and resolution of existing and disputed claims.
- f. Nothing herein shall be construed as the endorsement of, or acquiescence in, any trade practices of Defendants, past, current, or future; and, Defendants shall make no representations to the contrary.
- g. Nothing herein shall be construed as the admission by Defendants of any fact or the existence or application of any law, regulation, or legal principle applicable to Defendants; and the Attorney General shall make no representations to the contrary.

h. This Consent Judgment will be construed and enforced under the laws of the State of Arkansas.

IX. Signatories

a. Each undersigned representative of a party certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Judgment and legally bind such parties to its terms.

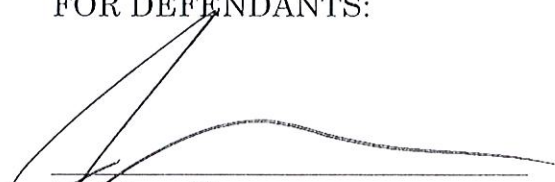
b. This Consent Judgment is made and entered into by and between the parties hereto and on this 7th day of February, ~~2022~~ 2023.

FOR THE ATTORNEY GENERAL:



Jason Epperson
Assistant Attorney General

FOR DEFENDANTS:



Harrison Kemp
Attorney for Defendants



Neill Reed



Jeric Goodrum

IT IS SO ORDERED.

CIRCUIT JUDGE

DATE: _____

Prepared By:

Jason Epperson, Ark Bar No. 2015083
Assistant Attorney General
Arkansas Attorney General's Office

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Type: JUDGMENT-CONSENT

So Ordered



